REMARKS

The foregoing Amendment and the following Remarks are submitted in response to the Office Action issued on March 16, 2005 in connection with the above-identified patent application, and are being filed within the three-month shortened statutory period set for a response by the Office Action.

Claims 2-5, 7-10, 13-15, 17, 19-22, 24-27, 30-32, and 34 are pending in the present application as amended. Claims 6, 11, 12, and 16 have been canceled and the language thereof has been substantially incorporated directly into independent claim 2, and claims 23, 28, 29, and 33 have likewise been canceled and the language thereof has been substantially incorporated directly into independent claim 19. Accordingly, claims 7, 8, 13, 17, 24, 25, 30, and 34 have been amended to adjust dependencies. Applicants respectfully submit that no new matter has been added to the application by the Amendment.

Applicants note that the Examiner points out instances where trademarks are used within the application, and suggests that such trademarks should be properly employed. Applicants respectfully note that such pointed-out trademarks all are owned by the assignee of the present application, either directly or indirectly, and that Applicants are not aware that the use of such trademarks is improper or without accompanying generic terminology.

Inasmuch as claims 2 and 19 now include the subject matter of claims 6, 11, 12, and 16 and 23, 28, 29, and 33, respectively, Applicants shall address the rejection of claims 2 and 19 in terms of the rejection set forth at page 11 et seq. of the Office Action, where the Examiner has rejected claims certain of the claims under 35 USC § 103(a) as being obvious over "SDMI Portable Device Specification" in view of Van Dyke (U.S. Patent No. 6,321,314) and further in view of Shear et al. (U.S. Patent No. 6,157721). Applicants

respectfully traverse the § 103(a) rejection insofar as it may be applied to the claims as amended.

Independent claim 2 as amended recites a computing device that includes a digital rights management (DRM) system thereon for allowing rendering of protected digital content on the computing device. The content includes video content to be displayed on a monitor coupled to the computing device, and the computing device also includes a video section therein for receiving the content and for producing a video signal to be sent to the monitor based on the received content. The video section includes video memory for storing the received content, and the video memory is configured to be write-only except with regard to the video section.

As amended, claim 2 recites that the video memory is configured to be write-only with regard to rights-protected digital content allowed to be rendered by the DRM system, and that the video section further includes an authentication device for authenticating to the DRM system that the video memory is configured to be write-only except with regard to the video section. The authentication device comprises a token as obtained from an authentication entity that is to be presented to the DRM system. Thus, a manufacture who wishes to manufacture the video section must obtain the token from the authentication entity and as a condition thereof must agree to provide the video section with the video memory configured to be write-only except with regard to the video section.

Claim 19 recites the subject matter of claim 2, but in terms of the video section.

As the Examiner points out, the SDMI reference discloses a computing device that allows for the controlled rendering of protected digital content. The Examiner concedes

that the SDMI reference does not disclose that such SDMI device has a video section for receiving content with a write-only memory except for such video section, as is required by claims 2 and 19. Nevertheless, the Examiner suggests that such a write-only memory would be obvious based on the Van Dyke reference teaching that memory can be configured to restrict access thereto.

In addition, the Examiner concedes that the SDMI and Van Dyke references do not disclose use of an authentication device for authenticating to the DRM system that the video memory is configured to be write-only except with regard to the video section, as is required by claims 2 and 19. Nevertheless, the Examiner suggests that such an authentication device would be obvious based on the Shear reference teaching use of an authentication device for authenticating that a module performs as intended.

Nevertheless, Applicants respectfully submit that the combination of the aforementioned references does not teach or suggest a computing device that includes a digital rights management (DRM) system thereon for allowing rendering of protected digital content on the computing device, where the content includes video content to be displayed on a monitor coupled to the computing device, and where the computing device also includes a video section therein for receiving the content and for producing a video signal to be sent to the monitor based on the received content, where the video section includes video memory for storing the received content, and where the video memory is configured to be write-only except with regard to the video section, and where the video memory is configured to be write-only with regard to rights-protected digital content allowed to be rendered by the DRM system, and where the video section further includes an authentication device for authenticating to the DRM system that the video memory is configured to be write-only

except with regard to the video section, and where the authentication device comprises a token as obtained from an authentication entity that is to be presented to the DRM system, all as required by claims 2 and 19. Thus such references cannot be combined to produce a system whereby a manufacture who wishes to manufacture the video section must obtain the token from the authentication entity and as a condition thereof must agree to provide the video section with the video memory configured to be write-only except with regard to the video section, as is also required by claims 2 and 19.

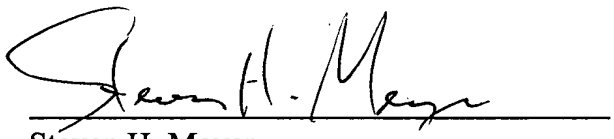
Accordingly, Applicant respectfully submits that the SDMI, Van Dyke, and Shear reference cannot be applied to make obvious claims 2 and 19 or any claims depending therefrom, including claims 3-5, 7-10, 13-15, 17, 20-22, 24-27, 30-32, and 34. Thus, Applicants respectfully request reconsideration and withdrawal of the § 103(a) rejection of such claims.

The Examiner has also rejected claims 17 and 34 under 35 USC § 103(a) as being obvious over the aforementioned references, and further in view of Hsu et al. (U.S. Patent No. 5,982,898). Applicants respectfully traverse such § 103(a) rejection.

Applicant respectfully submits that since independent claims 2 and 19 are unanticipated and have been shown to be non-obvious, then so too must all claims depending therefrom be unanticipated and non-obvious, including such claims 17 and 34, at least by their dependencies. Thus, Applicant respectfully requests reconsideration and withdrawal of such § 103(a) rejection.

In view of the foregoing discussion, Applicant respectfully submits that the present application, including claims 2-5, 7-10, 13-15, 17, 19-22, 24-27, 30-32, and 34, is in condition for allowance, and such action is respectfully requested.

Respectfully submitted,



Date: May 25, 2005

Steven H. Meyer
Registration No. 37,189

Woodcock Washburn LLP
One Liberty Place - 46th Floor
Philadelphia PA 19103
Telephone: (215) 568-3100
Facsimile: (215) 568-3439